

Sander L. Esserman (Admitted *Pro Hac Vice*)
 Robert T. Brousseau (Admitted *Pro Hac Vice*)
 Peter D'Apice
 Jo E. Hartwick (Admitted *Pro Hac Vice*)
 Jacob L. Newton (Admitted *Pro Hac Vice*)
 STUTZMAN, BROMBERG,
 ESSERMAN & PLIFKA,
 A PROFESSIONAL CORPORATION
 2323 Bryan Street, Suite 2200
 Dallas, Texas 75201
 Telephone: (214) 969-4900
 Facsimile: (214) 969-4999

COUNSEL FOR AD HOC COMMITTEE OF
 ASBESTOS PERSONAL INJURY CLAIMANTS

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X)	
)	
In re)	Chapter 11
)	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,)	
)	Case No. 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>)	
)	
Debtors.)	Jointly Administered
-----X		

**EXHIBIT TO DECLARATION OF SANDER L. ESSERMAN IN SUPPORT OF
 THE APPLICATION OF THE AD HOC COMMITTEE
 OF ASBESTOS PERSONAL INJURY CLAIMANTS FOR PAYMENT OF
 REASONABLE FEES AND EXPENSES PURSUANT TO 11 U.S.C. § 503(b)**

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET
SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbsp-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 112715
July 14, 2009

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 06/30/09

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
05/31/09	Review filings and pleadings and conference call with counsel concerning handling this case.	PCD	0.50
06/01/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
06/01/09	Telephone calls with CourtCall regarding appearance at scheduled 4:00 p.m. hearing.	CLJ	0.20
06/01/09	Review of order regarding joint administration, case management order, review of noticing procedures order regarding commencement and order extending time to file schedules and statements of financial affairs.	CLJ	0.50
06/01/09	Review notice of appearance and prepare pro hac vice motions and orders for Mr. Newton, Mr. Esserman, and Ms. Hartwick (0.2); research regarding payment procedures for filing fees associated with pro hac vice motions (0.5).	HJP	0.70
06/01/09	Review docket (1.5); correspondence regarding formation of Ad Hoc Committee of Asbestos Personal Injury Claimants; prepare Notice of Appearance on Behalf of Ad Hoc Committee of Asbestos Personal Injury Claimants; attend hearing on First Day Motions by telephone (0.7); prepare memorandum regarding key deadlines and hearings (2.5); prepare letter to United States Trustee regarding appointment of Asbestos Committee (1.0); pursue preparation of motions for admission pro hac vice (1.0).	JEH	6.70
06/01/09	Review filings concerning effect on tort claimants.	PCD	0.25
06/01/09	Draft Notice of Appearance for SBEP.	RLS	0.60
06/01/09	Prepare and revise letter to U.S. Trustee.	RTB	1.50
06/01/09	Work on Ad Hoc Committee issues (2.1); attend first day Hearings (1.6); conference with Committee members (1.0); work on sale motion (1.0).	SLE	5.70
06/01/09	Review master purchase and sale agreement, sale order and debtors' motion (2.0); preparation of summary of same (1.1).	SCT	3.10
06/02/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
06/02/09	File motions for admission pro hac vice (0.2); prepare Verified Statement	JEH	1.90

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	pursuant to Federal Rule of Bankruptcy Procedure 2019 (0.7); correspondence regarding meeting of creditors and appointment of Official Committee of Unsecured Creditors (0.5); attend telephonic meeting of Ad Hoc Committee of Asbestos Personal Injury Claimants (0.5).		
06/02/09	Participate on conference call (0.5) and begin work on Ad Hoc Committee Issues (.8).	RTB	1.30
06/02/09	Work on sale issues and pleadings regarding case (1.6); conference and correspondence with Committee members regarding case (0.6).	SLE	2.20
06/03/09	Review and analysis of court docket and review of orders and interim orders entered (0.5); correspondence regarding orders (0.1).	CLJ	0.60
06/03/09	Correspondence regarding selection of Official Committee of Unsecured Creditors and related matters.	JEH	1.90
06/03/09	Confer regarding Committee position on strategy.	RTB	1.00
06/03/09	Conference regarding case with members (0.9); review papers regarding case and open issues (1.0).	SLE	1.90
06/03/09	Revise summary of master purchase and sale agreement, sale order and debtors' motion.	SCT	0.65
06/04/09	Confer with Ms. Hartwick regarding appointment of FCR (0.3); pursue draft motion to appoint FCR (0.2).	ALD	0.50
06/04/09	Pursue recent filings and events in case (.3); conference call with Ad Hoc Committee of Asbestos Personal Injury Claimants (.8); prepare motion for appointment of Future Claims Representative and appointment of Asbestos Committee (1.1).	JEH	2.20
06/04/09	Meet with Mr. Brousseau regarding case law research regarding law governing appointment of additional creditors committees in the Second Circuit.	RLS	0.20
06/04/09	Confer with Committee members and work on motion for FCR.	RTB	2.00
06/04/09	Review pleadings; conference with members regarding case; conference call with Committee; correspondence with other tort reps regarding case.	SLE	3.80
06/04/09	Email correspondence with clients regarding strategy and analysis of strategy with Mr. Esserman (0.2). Attend ad hoc committee meeting by telephone conference call (0.2). Work on strategy assignments per committee direction (0.2).	SAF	0.60
06/05/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.60
06/05/09	Draft committee bylaws for ad hoc committee (1.8), confer with Mr. Brousseau regarding same (0.2).	JLN	2.00
06/05/09	Work on Motion to Appoint Future Claimants' Representative and Asbestos Committee.	JEH	3.20
06/05/09	Case law research regarding law governing appointment of additional creditors committees in the Second Circuit (6.2); meet with Mr. Brousseau and Ms. Hartwick regarding same (.7).	RLS	6.90
06/05/09	Work on motion to appoint FCR and Committee and challenge to 363 sale.	RTB	1.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 3

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
06/05/09	Work on case and correspondence regarding open issues (0.4); correspondence with group and Committee regarding open issues (0.7).	SLE	1.10
06/06/09	Review and revise draft committee bylaws and confer with Mr. Esserman and Mr. Brousseau regarding bylaws.	JLN	0.50
06/06/09	Research GM asbestos liability (3.5); review case law on Committees and add sections to motion (2.2); revise extensively (2.3).	RTB	8.00
06/06/09	Correspondence with parties regarding case and GM filings (0.6); review filed papers regarding case (0.7).	SLE	1.30
06/07/09	Review bankruptcy docket for for service list of parties to be noticed.	ALD	0.20
06/07/09	Work on Motion to Appoint Future Claimants' Representative and Asbestos Committee (6.5); prepare order granting same (0.5); prepare motion to shorten time for hearing on same and order granting motion to shorten time (3.5); electronically file and serve same (1.0).	JEH	11.50
06/07/09	Assist Ms. Hartwick and Mr. Brousseau regarding finalizing Motion to Appoint Official Asbestos Committee.	RLS	2.40
06/07/09	Work on motion (2.6); extensive revisions (3.4); confer with Committee Members (0.5) and work on Committee bylaws (1.5).	RTB	8.00
06/07/09	Work on GM papers regarding case and review and revise papers (1.8); conference with Committee members regarding case (0.7).	SLE	2.50
06/07/09	Asbestos committee/FCR motion - strategy and comments regarding Arguments (0.3); review draft motion and comments regarding motion (0.4).	SAF	0.70
06/08/09	Correspondence regarding committee matters (0.5); revise draft by-laws for ad hoc committee (1.0); review docket regarding recent filings (0.5); work on 2019 Statement and pro hac papers (0.4).	JEH	2.40
06/08/09	Work on Committee bylaws and official Committee issues (1.6); confer with U.S. Trustee's office (0.4).	RTB	2.00
06/08/09	Work on issues regarding case, sale and Committee.	SLE	0.80
06/08/09	Strategy regarding asbestos motion and expedited setting motion.	SAF	0.30
06/09/09	Review and analysis of court bankruptcy and appeal dockets and Correspondence with legal team regarding relevant pleadings.	CLJ	0.50
06/09/09	Review Judge Gerber's case management order and local rules regarding procedural issues relating to setting hearing on motion (0.5); confer with Ms. Hartwick regarding same (0.2).	HJP	0.70
06/09/09	Correspondence regarding contact information for Debtors' counsel (.2); conduct and review research regarding motion for 2004 examination of debtor and request for production of documents in connection with same (1.9); review order denying motion to expedite hearing on motion for order appointing Future Claimants' Representative and Asbestos Committee (.1); review Case Management Order and Local Rules regarding obtaining hearing date (.9); correspondence regarding same (.3); file pro hac vice papers for Messrs. Felsenthal and Brousseau (.4).	JEH	3.80
06/09/09	Telephone call with U.S. Trustee (0.8); work on obtaining hearing (1.2).	RTB	2.00
06/10/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 4

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
06/10/09	Locate example notice of hearing/motion at Ms. Hartwick's request.	HJP	0.10
06/10/09	Review Motion for Sale of substantially all of Debtors' assets and related papers; correspondence regarding scope of same, deadline for objections and hearing date.	JEH	0.40
06/10/09	Telephone conference with Ms. Blume regarding setting motion for appointment of Future Claimants' Representative and Asbestos Committee for hearing (.2); correspondence regarding same (.1); prepare certificate of service for motion for appointment of Future Claimants' Representative and Asbestos Committee and file same (.4); prepare notice of hearing on Future Claimants' Representative and Asbestos Committee, file and arrange for service of same (1.5); review and revise proposed Bylaws of Ad Hoc Committee of Asbestos Personal Injury Claimants (.5); correspondence regarding same (.3).	JEH	3.00
06/10/09	Locate certain docket entries and deadlines per Ms. Hartwick's request.	RLS	0.40
06/10/09	Confer regarding hearing on Committee motion and review and revise pleading (1.0); revise Committee bylaws (0.20).	RTB	1.20
06/10/09	Correspondence regarding case with Committee.	SLE	1.00
06/10/09	Review and revise draft ad hoc committee bylaws (0.9); correspondence with Ms. Hartwick and Mr. Brousseau regarding bylaws (0.3).	SAF	1.20
06/12/09	Review docket regarding recent filings (0.6); prepare Certificate of Service of Notice of Hearing on motion to appoint FCR and Asbestos Committee (0.3); prepare Ad Hoc Committee of Asbestos Personal Injury Claimants' objection to sale motion (1.0).	JEH	1.90
06/14/09	Review Sale Motion and Memorandum of Law in Support of same	JEH	0.65
06/14/09	Review application to employ Evercore Group LLC as Investment Banker and Financial Advisor to Debtors (.6); conduct and review research regarding fees paid to investment bankers and financial advisors (.8); prepare memorandum regarding matters scheduled for hearing and hearing dates (.4); correspondence regarding committee matters (.3).	JEH	2.10
06/14/09	Prepare Committee objection to sale and research sales in other cases.	RTB	4.00
06/14/09	Review filed objections (0.8); correspondence with Committee (0.2).	SLE	1.00
06/15/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.60
06/15/09	Review of court's calendar of events scheduled for hearing.	CLJ	0.40
06/15/09	Confer with Ms. Hartwick regarding research project related to sale motion.	HJP	0.25
06/15/09	Attend team strategy meeting (0.3), confer regarding new projects (0.2).	JLN	0.50
06/15/09	Work on objection to Sale Motion and summary of terms of sale	JEH	2.40
06/15/09	Detailed review of Application to Employ Evercore Group LLC as Investment Banker and Financial Advisor to Debtors regarding objecting to same (.9); review Notice of Appointment of Official Committee of Unsecured Creditors regarding membership and	JEH	3.20

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 5

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	payment pursuant to Sale Motion (.8); review research regarding sub rosa plans of reorganization (1.5).		
06/15/09	Review motion to approve retention of investment banker (0.7) and review files to prepare response (0.8).	PCD	1.50
06/15/09	Research regarding issues for objection to Debtor's Motion to employ Financial Advisors.	RLS	3.20
06/15/09	Prepare for hearing on Committee appointment and on compensation of financial advisor.	RTB	4.00
06/15/09	Conference and correspondence regarding objections filed in case.	SLE	1.00
06/16/09	Review and analysis of court docket and correspondence with legal team Regarding relevant pleadings.	CLJ	0.50
06/16/09	Review of Motion to Approve Sale (2.6), review Proposed Order regarding sale and proposed sale agreement regarding payments made to various constituencies (2.4); conferences with Ms. Hartwick regarding same; prepare summary of payments (0.6).	HJP	6.60
06/16/09	Work on objection to Sale Motion.	JEH	8.30
06/16/09	Research issues relating to retention of Evercore (1.1); review motion to retain Evercore and review 363 sale motion (1.0).	PCD	2.10
06/16/09	Research relating to Evercore retention (2.6) and draft objection to Evercore retention (2.2).	PCD	4.80
06/16/09	Research regarding issues for objection to Debtor's Motion to employ Financial Advisors.	RLS	3.80
06/16/09	Draft and revise objection to sale motion and objection to financial advisors.	RTB	6.00
06/16/09	Review and revise objections.	SLE	0.50
06/17/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.10
06/17/09	Calendar events scheduled for hearing.	CLJ	0.50
06/17/09	Confer with Ms. Hartwick regarding follow-up research related to payments being made to committee members (0.4); research regarding same (2.0).	HJP	2.40
06/17/09	Review sale related documents to determine who will own New GM after sale (1.1); confer with Mr. Brousseau and Ms. Hartwick regarding same (0.5).	HJP	1.60
06/17/09	Additional discussion with Ms. Hartwick about research needed for objection to sale motion.	HJP	0.20
06/17/09	Detailed review of Order regarding auction in Delphi bankruptcy case and Debtors' motion for alternative section 363 sale (1.1); revise Ad Hoc Committee bylaws (.4); prepare Verified Statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (.6); detailed review of Master Sale and Purchase Agreement, Motion for Approval of Sale of Assets under Section 363, and Affidavit of Frederick Henderson regarding beneficiaries of 363 Sale and regarding allocation of proceeds of sale and subsequent liquidation of remaining assets (1.9); revise Ad Hoc Committee of	JEH	5.70

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 6

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	Asbestos Personal Injury Claimants to Sale Motion (1.3); prepare services lists for objections (.4).		
06/17/09	Research and draft Response to Motion to Retain Investment Bankers (4.2) and review response to Motion to Sell Assets (2.0).	PCD	6.20
06/17/09	Research regarding issues for objection to Debtor's Motion to employ Financial Advisors.	RLS	4.20
06/17/09	Make additions to draft Objection to Debtor's Application to retain Evercore as Financial Advisor.	RLS	1.20
06/17/09	Locate relevant agreements and pleadings filed in Delphi bankruptcy case.	RLS	0.70
06/17/09	Continue work on objections.	RTB	4.50
06/17/09	Work on papers regarding case (1.5) and correspondence regarding Same (0.7);work on briefs (0.8).	SLE	3.00
06/18/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
06/18/09	Review Supreme Court Decision in Manville appeal for use in Objection to 363 Transaction, confer with Ms. Hartwick regarding same.	HJP	0.80
06/18/09	Assist with revisions to objection to sale motion.	HJP	0.30
06/18/09	Research regarding ownership of New GM and assets that will be left in the Old GM estate after the 363 Transaction (3.1); multiple correspondence and conferences with Ms. Hartwick and Ms. Khoshbin regarding same (0.7).	HJP	3.80
06/18/09	Conduct and review fact and legal research regarding objection to sale motion (3.8); revise objection to sale motion (1.4); review objection to Debtors' motion to retain Evercore (.5); prepare certificates of service for motions (.6).	JEH	6.30
06/18/09	Draft and edit briefs in response to motion to retain investment bankers.	PCD	3.50
06/18/09	Additional research regarding issues for objection to Debtor's Motion to employ Financial Advisors.	RLS	2.80
06/18/09	Draft tables of contents and authorities for Objections to Debtors' Sale Motion and Motion to Employ Financial Advisors (2.2); check subsequent history for all cases cited therein and add where required (1.2).	RLS	3.40
06/18/09	Confer regarding 363 motion and objection (0.6); numerous revisions (2.4); revise objection to financial advisors (2.5); prepare for hearing (1.5).	RTB	7.00
06/18/09	Work on papers and filing issues regarding case.	SLE	1.50
06/18/09	Research assets not included in 363 sale and distribution scheme.	TDK	2.50
06/19/09	Review and analysis of court docket and correspondence with legal team Regarding relevant pleadings.	CLJ	0.50
06/19/09	Review Judge Gerber's Case Management Order (0.4) and work with Ms. Hartwick to resolve issue relating to service lists for Objection to Retention of Financial Advisor and Objection to Sale Motion (0.8).	HJP	1.20
06/19/09	Review and revise Objection to Retention of Financial Advisor and	HJP	1.00

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 7

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	Objection to Sale Motion (0.7); assist with filing and service of same (0.3).		
06/19/09	Review and revise the Objections of the Ad Hoc Committee of Asbestos Personal Injury Claimants to the Sale Motion and to the Motion Authorizing the Employment and Retention of Evercore LLC as Investment Banker and Financial Advisor of the Debtors (1.4); electronically file and serve same (0.6); review docket regarding other objections to Sale Motion (2.2); review Debtors' Omnibus Objection to Motions to Appoint Asbestos Committee and Consumer Victims Committee (2.0).	JEH	6.20
06/19/09	Work on brief.	PCD	0.50
06/19/09	Continued work on brief.	PCD	1.30
06/19/09	Edit brief in response to motion for Evercore retention.	PCD	1.00
06/19/09	Final revisions to Objection to Debtors' Motion to Employ Financial Advisors (0.8) and communications regarding revisions (0.2).	RLS	1.00
06/19/09	Work on sale issues.	RTB	3.50
06/19/09	Work on case and filings (0.4); revise papers (1.4); correspondence with Committee regarding case (0.2).	SLE	2.00
06/21/09	Work on case and pleadings.	SLE	0.75
06/22/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
06/22/09	Confer with Ms. Hartwick regarding delivery of chambers copies of Objections to Sale Motion and Employment of Evercore (0.2); review local rules and case management order for procedures related to same (0.2); phone call and multiple email correspondence with Mr. Benhamou at Brune and Richard regarding delivery of Chambers copies to Judge Gerber (0.4).	HJP	0.80
06/22/09	Pursue delivery of copies of objections filed on Friday to chambers (.2); file Certificates of Service of Objections to Debtors' application to employ and retain Evercore Group LLC and to Debtors' Motion to Sell Substantially All of Their Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests (.4); prepare outline of relief sought in Sale Motion (1.1); complete Verified Statement Pursuant to Bankruptcy Rule 2019 (.4).	JEH	2.10
06/22/09	Review objection to 363 and Evercore motions and other pleadings filed in case.	PCD	1.80
06/22/09	Review of papers regarding case and hearing.	SLE	0.75
06/23/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
06/23/09	Preparation for hearing on debtors motion to retain Evercore Group and motion to appoint committee of asbestos personal injury claimants.	CLJ	3.00
06/23/09	Multiple conference with Ms. Khoshbin and Ms. Hartwick regarding hearing preparations for hearings on committee motion, motion to employ Evercore, and sale motion.	HJP	0.40
06/23/09	Locate case for Mr. Esserman.	HJP	0.10
06/23/09	Prepare summary of key terms of Master Purchase and Sale	JEH	3.90

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 8

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	Agreement and summary of published reports regarding General Motors bankruptcy and sale of substantially all of its assets (3.1); conference call with Ad Hoc Committee (0.8).		
06/23/09	Review briefs and papers filed.	PCD	1.50
06/23/09	Determine total number of objections to Ad Hoc Committee's motion for official committee per Ms. Hartwick's Request.	RLS	0.40
06/23/09	Work on 363 objections and prepare for and participate in Ad Hoc Committee call.	RTB	2.90
06/23/09	Conference regarding case and hearing.	SLE	1.00
06/23/09	Research and compile facts surrounding aspects of GM plan and treatment of creditors.	TDK	4.50
06/24/09	Begin review of the various objections to the Sale Motion, summarizing the various objections in a spreadsheet.	DAK	7.00
06/24/09	Confer regarding Verified Statement Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (0.1); finalize, file and serve Statement (0.3); review Debtors' Motion to approve Master Disposition Agreement with Delphi Corporation (1.2); revise list of members of Official Committee of Unsecured Creditors and benefits some will receive from proposed 363 sale (0.3); coordinate review of objections to Sale Motion (0.3); review Notice of Withdrawal Without Prejudice of Motion of Ad Hoc Committee of Consumer-Victims of General Motors for Appointment of Official Committee of Tort Claimants and Official Committee of Unsecured Creditors' Limited Objection to Debtors' Sale Motion (0.3); correspondence regarding withdrawal (0.3); review Debtors' response to objection to employment and retention of Evercore Group LLC as investment banker and financial advisor (1.1); conduct and review research regarding interpretation of "disinterestedness" requirement in the Second Circuit (1.6); review written discovery served on parties to the Master Sale and Purchase Agreement and depositions of those parties (0.8); revise Confidentiality Order and Privacy Act Order to add executed signature block for Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation as counsel for the Ad Hoc Committee of Asbestos Claimants (0.2).	JEH	6.50
06/24/09	Review briefs and filings and prepare for depositions (2.2); work on discovery issues (2.3).	PCD	4.50
06/24/09	Read and analyze Debtors' Omnibus Response to Objections to its Motion to Retain Evercore as Financial Advisor (1.4); confer with Mr. D'Apice regarding response to same (0.5); draft email to Mr. Esserman regarding our replies in opposition to Debtors' Response (1.0).	RLS	2.90
06/24/09	Locate certain certificates and 2019 statements on the docket per Ms. Hartwick's Request.	RLS	0.50
06/24/09	Confer with Committee counsel (0.8); prepare and review 2019 statement (0.5) and prepare for hearing(1.7).	RTB	3.00
06/24/09	Preparation for hearings (2.5); conference with clients regarding Case (1.0).	SLE	3.50
06/24/09	Committee motion - review cases (0.2); study Supreme Court Manville Decision (0.2); draft arguments (0.5); correspond with Mr. Esserman regarding same (0.1).	SAF	1.00

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 9

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
06/25/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.70
06/25/09	Continue review of the various objection to the Sale Motion, summarizing the various objections in a spreadsheet (6.2); review a sample of objections filed by or on behalf of individual objectors (2.2).	DAK	8.40
06/25/09	Review local rules and confer with Ms. Hartwick regarding necessity of witness lists.	HJP	0.20
06/25/09	Review discovery served in case (0.3); review and revise Ad Hoc Committee's Requests for Production of Documents to Debtors (2.6); arrange for location for production of documents, if necessary (0.3); correspondence regarding schedule of depositions and participation in same (0.2); work on Notice of 30(b)(6) Deposition of Mr. Wilson (1.4); correspondence regarding committee matters; brief review of recent filings (0.3).	JEH	5.30
06/25/09	Review materials filed and prepare for depositions.	PCD	3.50
06/25/09	Draft Ad Hoc Committee's First Request for Production of Documents to Debtor (4.1); make amendments and corrections to Requests (1.2).	RLS	5.30
06/25/09	Draft Notice of Deposition under Rule 30(b)(6) of Harry Wilson.	RLS	2.10
06/25/09	Prepare for opposition to sale motion.	RTB	4.00
06/25/09	Attend hearing regarding case (3.0); conference with clients regarding Hearing (0.5).	SLE	3.50
06/26/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.50
06/26/09	Preparation for hearing regarding Debtors motion to approve sale.	CLJ	4.00
06/26/09	Continue review of the various objections to the Sale Motion, summarizing the various objections in a spreadsheet.	DAK	7.20
06/26/09	Correspondence regarding production of documents in response to Ad Hoc Committee of Asbestos Personal Injury Claimants RFP (1.2); correspondence regarding obtaining access by co-counsel for claimants to confidential information produced by Debtors (0.5); prepare letter for each committee member's counsel requesting access; correspondence with each member of the Ad Hoc Committee forwarding individual letter regarding same (3.9); follow up correspondence regarding letters (0.2); prepare Notice of Deposition providing topics pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure for deposition of Harry Wilson (0.4).	JEH	6.20
06/26/09	Conference call with Caplan Drisdale and prepare for deposition of Fritz Henderson.	PCD	2.50
06/26/09	Revise and make additions to Notice of Deposition under Rule 30(b)(6) of Harry Wilson.	RLS	3.70
06/26/09	Prepare for sale hearing.	RTB	2.00
06/26/09	Correspondence regarding discovery and open issues (0.5); work on discovery and depositions(1.5); conference with Mr. Reinsel, et al. (0.2); prepare for hearings (0.3).	SLE	2.50
06/27/09	Work on document review in connection with hearing on 363 motion.	HJP	7.50
06/27/09	Attend deposition of Michael Raleigh by telephone (7.8); prepare	JEH	10.20

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 10

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	summary of same (1.4); correspondence regarding documents being produced by Debtors (0.4); correspondence with Ad Hoc Committee members regarding confidentiality order and obtaining documents pursuant to same (0.6).		
06/27/09	Work on sale issues (1.6); correspondence regarding case (0.2); conference with Committee regarding case (0.2).	SLE	2.00
06/28/09	Continue reviewing documents in connection with depositions related to 363 sale.	HJP	9.30
06/28/09	Assist with preparation of hearing materials for Mr. Esserman for hearing on 363 sale.	HJP	0.40
06/28/09	Coordinate review of documents produced by Debtors (4.9); review and organize documents (2.2); locate exhibits being used in deposition of Fritz Henderson (1.2); review summary of Mr. Henderson's deposition (0.3); review GM's Bankruptcy website regarding time of Sale Hearing and other matters being heard (0.3).	JEH	8.90
06/28/09	Prepare for and participate in deposition of Fritz Henderson (8.0); prepare report and review documents for preparation for hearing (3.8).	PCD	11.80
06/28/09	Document review in preparation for deposition of Harry Wilson.	RLS	7.70
06/28/09	Work on issues regarding case (1.5); correspondence regarding Case (0.5); meet regarding case (0.6); review of papers regarding case (0.4).	SLE	3.00
06/29/09	Review documents produced in discovery in preparation for sale hearing.	BLC	8.60
06/29/09	Continued preparation for hearing regarding sale motion.	CLJ	7.50
06/29/09	Review GM's document and review documents produced, focusing on efforts on searches to located the future study and other documents related to asbestos issues and the AlixParters liquidation analysis.	DAK	9.80
06/29/09	Meeting with Mr. Brousseau and Ms. Hartwick regarding project related to asbestos issues.	HJP	0.30
06/29/09	Review email correspondence regarding hearing on 363 sale motion and recently filed amended purchase and sale agreement; locate PSA and follow-up correspondence regarding PSA.	HJP	0.40
06/29/09	Assist in preparing Mr. Esserman for hearing on the 363 sale motion.	HJP	1.90
06/29/09	Continue to review documents produced by GM.	HJP	4.90
06/29/09	Multiple phone calls and email correspondence with Brun e & Richard regarding delivery of chambers copy of witness and exhibit list of 363 sale hearing.	HJP	0.30
06/29/09	Correspondence regarding letters from members of Ad Hoc Committee to obtain access to confidential information (0.4); review documents produced by Debtors (2.2); review Master Sale and Purchase Agreement and exhibits to same and transcript of deposition of Fritz Henderson regarding ownership interests in New GM (3.0); prepare memorandum regarding same (0.6); review documents produced by Debtors used as exhibits in deposition of Harry Wilson (1.8); prepare Ad Hoc Committee of Asbestos Personal Injury Claimants' Evidence and Witness List, electronically file and serve same, and arrange for delivery of chambers copy of same (1.4).	JEH	9.40

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 11

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
06/29/09	Review documents produced by GM to prepare for hearing and to prepare argument against sale.	PCD	4.70
06/29/09	Continue review of documents produced by GM to prepare for sale hearing and to prepare argument against sale.	PCD	3.20
06/29/09	Continue review of documents produced by GM and deposition testimony for preparation of argument against sale.	PCD	2.40
06/29/09	Draft summary cover sheets for key documents and exhibits for use by Mr. Esserman during hearing on Sale Motion.	RLS	2.50
06/29/09	Document review in preparation for hearing on Sale Motion.	RLS	8.20
06/29/09	Draft Witness and Exhibit list for hearing on Sale Motion.	RLS	0.80
06/29/09	Procure exhibits for Mr. D'Apice during deposition of Harry Wilson.	RLS	2.00
06/29/09	Prepare for hearing on opposition to sale motion (1.8) and work on legislative and appeal issues (1.2).	RTB	3.00
06/29/09	Attend hearing on GM sale (5.5); conference regarding same (1.5); prepare for same (1.5).	SLE	8.50
06/30/09	Review documents produced in discovery in preparation for sale hearing.	BLC	3.70
06/30/09	Assist in matters relating to GM hearing.	CLJ	2.50
06/30/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.50
06/30/09	Review discovery production regarding liquidation issues.	CIT	2.50
06/30/09	Review materials relating to recent bankruptcies based on liquidation under Section 363 (0.6); analyze similarities and structure (0.4); conduct legal research regarding applicability of section 1141 and 727 proscription of discharge for corporate debtors (0.8).	CIT	1.80
06/30/09	Analyze issues regarding scope of release provided for under Section 363 (1.4); conduct legal research regarding same (1.6); review materials regarding same (1.0); email correspondence regarding same (0.4).	CIT	4.40
06/30/09	Continued review of GM's document production, focusing efforts on searches to locate AlixParters liquidation analysis and related documents.	DAK	8.20
06/30/09	Review discovery materials to identify critical issues; conferences regarding same.	DJP	5.70
06/30/09	Review memos from Mr. Kazan (0.6); meet with Mr. Taylor and Ms. Hartwick to discuss project for congressional paper (0.4); begin researching matters related to same (2.2).	HJP	3.20
06/30/09	Additional review of documents produced by debtor.	HJP	1.50
06/30/09	Review documents produced by Debtors (3.7); correspondence with members of Ad Hoc Committee of Asbestos Personal Injury Claimants regarding executing confidentiality order (0.6); review motion to approve sale pursuant to Section 363, order granting same and Master Purchase and Sale Agreement for specific terms (2.0); correspondence regarding order on motion for appointment of Future Claimants' Representative and Asbestos Committee (0.3); conference regarding preparation of paper to submit to Senator Whitehouse (0.3).	JEH	6.90

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 12

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
06/30/09	Gather materials for use by Mr. Esserman at hearing in objection to sale of assets to Newco.	PCD	1.50
06/30/09	Retrieve items for use at hearing to oppose sale of assets to NewCo.	PCD	0.50
06/30/09	Review documents produced by GM and gather together information for use at hearing to oppose sale of assets to New GM.	PCD	3.50
06/30/09	Document review in preparation for hearing on Sale Motion.	RLS	7.80
06/30/09	Work on 363 sale issues.	RTB	1.50
06/30/09	Prepare for hearings (2.5); attend hearings regarding case (8.5); conference regarding same (0.7); review depositions (0.3).	SLE	12.00
Total Hours			574.45

Timekeeper Summary

Andrea L Ducayet	0.70	\$255.50
Briana Cioni	12.30	\$3,690.00
Cindy L Jeffery	26.50	\$4,637.50
Cliff I Taylor	8.70	\$3,045.00
David A Klingler	40.60	\$17,255.00
David J Parsons	5.70	\$2,080.50
Heather Panko	50.85	\$13,983.75
Jacob L Newton	3.00	\$1,200.00
Jo E Hartwick	133.15	\$52,594.25
Peter C D'Apice	63.05	\$33,101.25
Rachael Stringer	74.70	\$16,807.50
Robert T Brousseau	73.90	\$40,645.00
Sander L Esserman	66.75	\$46,725.00
Stephanie Tydlaska	3.75	\$1,312.50
Steven Felsenthal	3.80	\$2,755.00
Terrie D Khoshbin	7.00	\$2,275.00
Total Fees		\$242,362.75

Itemized Expenses:

Outside printing charges	13.59
Deliveries	37.98
Filing Fees	125.00

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 13

Itemized Expenses:

Long distance telephone charges	6.05
Photocopies	359.20
<hr/> Total Expenses	<hr/> \$541.82

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 112715

Page 14

Summary of Charges on this Invoice:

Hours	574.45
Fees	\$242,362.75
Expenses	\$541.82
Adjustments	\$0.00
<hr/> Total for this Invoice	<hr/> \$242,904.57

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET

SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbep-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 113929

August 17, 2009

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 07/31/09

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/01/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
07/01/09	Analyze issues relating to section 363 sale hearing and email correspondence regarding same.	CIT	0.50
07/01/09	Research issues relating to liquidation of corporate debtor and available discharge for same (3.2); email correspondence regarding issues.	CIT	3.80
07/01/09	Research regarding successor liability and liquidation issues.	DJP	2.30
07/01/09	Multiple conferences with Mr. Taylor regarding status of 363 research and follow-up research regarding section 363.	HJP	1.90
07/01/09	Work on brief and 363 issues.	JLN	0.30
07/01/09	Prepare Notice of Appeal of Sale Order (1.1); review papers filed by Indiana Pensioners in appeal of Sale Order in Chrysler bankruptcy (0.6); correspondence and telephone conference with Ms. Whetstone regarding list of clients of Waters & Kraus LLP (0.8); review form of confidentiality order to be executed (1.1).	JEH	3.60
07/01/09	Pull materials together for hearing.	PCD	0.50
07/01/09	Prepare for hearing.	PCD	0.50
07/01/09	Research and preparations for district court and Second Circuit appeal regarding Sale Order.	RLS	4.10
07/01/09	Assist in preparation for hearing and in preparation of appeal papers.	RTB	3.00
07/01/09	Prepare examinations and arguments and attend hearings (6.4); review Documents (2.1); examine witnesses (4.2).	SLE	12.70
07/02/09	Confer with C. Taylor regarding certain research issues (0.6); continue legal research regarding same (6.8).	BLC	7.40
07/02/09	Review and analysis of court docket and correspondence with legal team	CLJ	0.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	regarding relevant pleadings.		
07/02/09	Review of agenda of July 2 (0.2); assistance in hearing and review of correspondence from Mr. Esserman relating to motion for sale hearing (0.8); search regarding latest media information (0.3).	CLJ	1.30
07/02/09	Analyze issues for appellate briefing relating to Sale Order (1.8); conduct legal research regarding Sale Order (2.5); formulate argument (1.5).	CIT	4.80
07/02/09	Draft Motion for direct appeal (1.5); prepare proposed order regarding appeal (0.6); legal research regarding appeal (0.5); prepare argument for appeal (0.5).	CIT	3.10
07/02/09	Research regarding successor liability and liquidation issues.	DJP	2.10
07/02/09	Review pleadings and conduct additional research regarding section 363 sale issues (3.0); multiple conferences with Ms. Cioni and Mr. Taylor regarding sale issues (0.7).	HJP	3.70
07/02/09	Confer with Ms. Hartwick regarding recently received document Production and work on discovery matters related to same.	HJP	0.60
07/02/09	Correspondence regarding sale motion and appeal (0.6); review and organize correspondence from counsel for member of the Ad Hoc Committee of Asbestos Personal Injury Claimants, lists of clients and executed confidentiality order (1.8); conferences regarding preparation of papers in appeal of order approving sale (0.5); pursue research regarding appeal.	JEH	3.90
07/02/09	Work on appellate issues and review filings and briefs for impact on client's interest.	PCD	1.00
07/02/09	Research regarding issues for appeal of Sale Order.	RLS	2.80
07/02/09	Work on sale hearing preparation.	RTB	1.00
07/02/09	Attend hearing regarding case (6.0); prepare for hearing and review of Documents (2.5).	SLE	8.50
07/03/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
07/03/09	Work on appellate issues.	PCD	0.40
07/03/09	Work on case and post-hearing issues (1.5); work on revisions to sale order (1.3).	SLE	2.80
07/04/09	Continue research on issues relating to release of successor liability in a section 363 sale.	HJP	3.50
07/04/09	Work on order and revisions (1.2); review of order (0.4); correspondence regarding order (0.6); review of documents regarding case (0.5).	SLE	2.70
07/05/09	Draft appellate arguments relating to Sale Order.	CIT	4.60
07/05/09	Additional research regarding section 363 sale issues.	HJP	1.90
07/05/09	Review and revise Notice of Appeal (0.7); correspondence regarding status of case (0.2); review recent filings (0.2).	JEH	1.10
07/05/09	Work on case and open issues (0.8); correspondence regarding Revisions (0.7).	SLE	1.50
07/05/09	Travel regarding case at 50%.	SLE	2.50
07/06/09	Confer with C. Taylor regarding appeal brief (0.4); perform legal research on certain issues related thereto (2.6).	BLC	3.00

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 3

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/06/09	Review and comments to motion for stay pending appeal and related orders.	BLC	0.80
07/06/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
07/06/09	Download audio of July 2 hearing.	CLJ	0.70
07/06/09	Review of decision and order entered regarding sale motion.	CLJ	0.30
07/06/09	Draft motion for direct appeal and stay pending appeal (2.0); facilitate filing and service of motion (0.3); analyze issues regarding motion (0.4).	CIT	2.70
07/06/09	Draft motion for direct appeal (3.4); analyze issues regarding motion (1.4).	CIT	4.80
07/06/09	Draft appellate argument regarding Sale Order.	CIT	3.40
07/06/09	Review correspondence regarding sale order.	HJP	0.10
07/06/09	Confer with Mr. Taylor regarding status of research regarding 363 and discharge issues (0.3); continue research regarding discharge issues (2.8).	HJP	3.10
07/06/09	Assist with preparation of proposed orders for filing with motion to stay Sale Order pending appeal.	HJP	0.30
07/06/09	Research inquiry from Mr. Esserman regarding appeal issues and correspondence regarding issues.	HJP	0.30
07/06/09	Review Order Approving Sale of Assets (1.0) revise Notice of Appeal to incorporate docket number and date of Order (0.2); work on Motion to Certify Appeal to the Court of Appeals or, in the Alternative, for Stay Pending Appeal (2.8); file and serve Notice of Appeal and Motion to Certify Appeal to Court of Appeals and for Stay Pending Appeal (1.1); review Motion to Certify Appeal to the Court of Appeals filed by Individual Accident Victims 0.8).	JEH	5.90
07/06/09	Review opinion and order relating to sale.	PCD	0.50
07/06/09	Work on appellate motion and motion to stay.	PCD	1.50
07/06/09	Assist in preparing Notice of Appeal of Sale Order.	RLS	1.40
07/06/09	Conference with Mr. Jacobowski and objectors (0.8); review of opinion and order (0.2); work on motion regarding 2nd Circuit and attend court hearing regarding 2nd Circuit (2.5); revise motion (1.5); attend Committee conference call (0.7); correspondence with Committee (0.5); attend to finalization of motion (1.0); conference with Mr. Bressler (0.8).	SLE	8.00
07/07/09	Research District Court rules regarding filing of miscellaneous proceeding.	ALD	0.70
07/07/09	Preparation of Emergency Motion for Expedited Appeal and Stay (2.8); legal research regarding motion (6.7); revisions per J. Hartwick comments (1.6).	BLC	11.10
07/07/09	Telephone conference with CourtCall regarding participation of Messrs. Esserman and D'Apice in July 7, hearings and review of CourtCall confirmations.	CLJ	0.40
07/07/09	Assistance with regard to appeal matters.	CLJ	3.30

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 4

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/07/09	Prepare for hearing on motion for certification to Second Circuit and for stay (1.7); work on District Court motion for stay (1.6).	CIT	3.30
07/07/09	Review local rules regarding filing of miscellaneous matters (0.4); draft correspondence to David Benhamou regarding filing of miscellaneous matter in District Court (0.3).	HJP	0.70
07/07/09	Multiple email correspondence and phone call with David Benahmou regarding delivery of Chambers Copies of Motion for Stay and Certification of Appeal (0.3); review local rules regarding format for proposed orders (0.3).	HJP	0.60
07/07/09	Conduct additional research regarding 363 issues per Mr. Taylor's Request (2.8); confer with Mr. Taylor regarding 363 issues (0.4).	HJP	3.20
07/07/09	Correspondence regarding status of case and regarding asbestos claims against GM (0.8; review sale documents and affidavits (2.8; work on Emergency Motion for Expedited Appeal and Stay Pending Appeal to file in District Court.and Declaration of Peter D'Apice in support of same (3.0); attend hearing on Motion to Certify Appeal to the Court of Appeals or, in the Alternative, for Stay Pending Appeal by telephone (2.2).	JEH	8.80
07/07/09	Continue work on emergency motion papers and continue review of research and materials, deal documents, and other motion papers and responses for preparation for emergency motions.	PCD	5.30
07/07/09	Prepare for hearing.	PCD	0.80
07/07/09	Work on drafts of emergency motions to stay and for expedited appeal and review research on various appellate issues.	PCD	4.20
07/07/09	Assist in preparing Motion for stay and for expedited appeal in the District Court.	RLS	3.40
07/07/09	Research regarding necessity of posting bond for stay pending Appeal (3.1); prepare short memo for Mr. D'Apice regarding same (1.2).	RLS	4.30
07/07/09	Work on stay motion and pleadings and revisions to same (1.8); correspondence with Committee (0.5); conference call with appellants regarding case (0.7).	SLE	3.00
07/07/09	Prepare section on brief regarding expedited consideration of appeal.	TDK	3.50
07/08/09	Research procedures for filing miscellaneous proceeding in SDNY (0.9); multiple telephone calls with clerk regarding miscellaneous proceeding filings (0.6); liase with New York counsel regarding filing of motion for stay (0.3); confer with Ms. Hartwick regarding motion for stay (0.3).	ALD	2.40

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 5

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/08/09	Finalize Emergency Motion for Expedited Appeal and Stay (2.9); preparation of Designation of Record on Appeal and Presentment of Issues on Appeal (7.4).	BLC	10.30
07/08/09	Telephone call with Appeals Clerk regarding procedures regarding Notice of Appeal (0.3); preparation of civil cover sheet and required documents for notice of appeal and regarding sale order (1.7); preparation of correspondence to Appeals Clerk regarding civil cover sheet (0.7).	CLJ	2.70
07/08/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/08/09	Review of bench decision and order regarding motion for certification.	CLJ	0.30
07/08/09	Prepare for July 9th hearing on motion to stay Sale Order and expedite appeal.	CIT	3.90
07/08/09	Prepare materials for appeal of the Sale Order to District Court (1.2); analyze appellate arguments (1.0); work on brief (2.4).	CIT	4.60
07/08/09	Review and revise District Court Motion to stay Sale Order pending Appeal (3.1); facilitate filing of motion (0.5).	CIT	3.60
07/08/09	Assist with preparations for emergency hearing before district court (0.3); pull case law for Mr. Esserman and Mr. D'Apice (0.4); prepare certificate of service for second circuit (0.3).	HJP	1.00
07/08/09	Work on Emergency Motion of the Ad Hoc Committee of Asbestos Personal Injury Claimants for Expedited Appeal and a Stay Pending Expedited Appeal (5.2); finalize Declaration of Peter C. D'Apice in support of motion (1.3); telephone conference with Judge Kaplan's clerk regarding videoconference hearing, deadline for opposing papers and method for submitting same (0.7); correspondence and multiple telephone conferences regarding setting up videoconference hearing for participants in various cities (1.2).	JEH	8.40
07/08/09	Compile cases from West Law regarding Motion for Expedited Appeal.	MRF	1.00
07/08/09	Continue preparation and drafting of emergency motion to district court for stay and expedited appeal (1.2); analyze case law and statutory issues (0.9); analyze procedural issues related to expedited appeals (0.8); review research (0.9).	PCD	3.80
07/08/09	Continue preparation of emergency papers and review of case law and appellate issues.	PCD	4.20
07/08/09	Work on filing of emergency motions and scheduling with court (2.2); conferences with opposing counsel concerning scheduling of hearing (0.7); prepare for hearing before district court on emergency motion for stay and for expedited appeal (2.6).	PCD	5.50
07/08/09	Assist in finalizing Motion for stay and for expedited appeal in the District Court and preparing exhibits for same.	RLS	1.80
07/08/09	Research regarding procedure and required filings for appeal to District Court for Southern District of New York.	RLS	0.70
07/08/09	Prepare hearing binder for Mr. D'Apice.	RLS	0.80
07/08/09	Extensive work on stay and appeal issues and confer regarding second circuit issues.	RTB	4.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 6

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/08/09	Work on case and stay motion (1.8); prepare for hearing regarding Case (1.7).	SLE	3.50
07/08/09	Confer with SBEP team regarding strategy and arguments for stay and appeal (0.6). Email with Mr. Esserman regarding appeal (0.2). Develop and discuss appeal issues and argument (0.2). Further conference with Mr. D'Apice and Mr. Taylor regarding strategy (0.2). Emails regarding argument per Manville (0.1). Confer regarding video Hearing (0.1).	SAF	1.40
07/09/09	Preparation in connection with hearing on motion to expedite appeal and stay pending appeal (1.2); confer with C. Taylor regarding same and next step (0.3).	BLC	1.50
07/09/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/09/09	Review of Errata Order regarding bench decision regarding order on motion for clarification.	CLJ	0.10
07/09/09	Email correspondence regarding documentation relating to sale agreement and approval and address issues regarding sale agreement.	CIT	0.50
07/09/09	Analyze scheduling issues for appeal and email correspondence regarding schedule.	CIT	0.40
07/09/09	Review papers in opposition to Emergency Motion of the Ad Hoc Committee of Asbestos Personal Injury Claimants for Expedited Appeal and a Stay Pending Expedited Appeal filed by Debtors, the Official Committee of Unsecured Creditors and the United States (1.9); attend video conference hearing on Emergency Motion (0.5); correspondence regarding strategy going forward (0.3); prepare and file Certificates of Service of Notice of Appeal and of Motion to Certify Appeal to the Court of Appeals or, in the Alternative, for Stay Pending Appeal (1.0).	JEH	3.90
07/09/09	Pull together materials needed for appellate argument in district Court (0.6) and work on issues related to appeal (2.9).	PCD	3.50
07/09/09	Confer regarding GM sale remedy and stay motion.	RTB	2.00
07/09/09	Argue case before District Court (1.2); Committee conference regarding Case (0.8); review pleadings regarding case (1.5).	SLE	3.50
07/09/09	Confer with Mr. Esserman and Mr. D'Apice regarding strategy following District Court hearing and settlement options.	SAF	0.25
07/10/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/10/09	Review of docket and Judge Kaplan decision.	CLJ	0.60
07/10/09	Correspondence regarding status of matter and strategy going Forward (0.7); review Judge Kaplan's Memorandum and Order denying motion for stay pending appeal and granting motion for expedited appeal (0.8).	JEH	1.50
07/10/09	Confer regarding GM sale.	RTB	1.00
07/10/09	Conference call with Committee regarding case (0.6); call with Mr. Bowman regarding case (0.4).	SLE	1.00
07/10/09	Calls with GM's counsel (0.2); correspondence regarding case and Appeal (0.3).	SLE	0.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 7

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/11/09	Correspondence regarding case and appeal.	SLE	1.00
07/12/09	Prepare Notice of Motion to Dismiss Appeal, Motion and Order Dismissing Appeal.	JEH	1.60
07/12/09	Work on case and to correspondence regarding appeal issues (0.7); correspondence regarding dropping of appeal (0.8).	SLE	1.50
07/13/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.40
07/13/09	Review of amended notice of case caption.	CLJ	0.10
07/13/09	Revise motion to dismiss appeal, notice of motion and proposed Order (1.9); facilitate filing of motion and notice.	CIT	2.10
07/13/09	Review email correspondence regarding dismissal of appeal and comment on same.	CIT	0.20
07/13/09	Call with David Benhamou at Brune & Richard regarding filing of papers in district court and delivery of chambers copies to Judge Kaplan; multiple conferences with Ms. Hartwick regarding filing of Motion to Dismiss appeal and related papers.	HJP	0.20
07/13/09	Telephone conference with Judge Kaplan's clerk regarding motion to dismiss appeal (0.2); multiple conferences regarding motion to dismiss (0.8); prepare Affidavit of Service and correspondence (1.4).	JEH	2.40
07/13/09	Assist with preparation of Motion to Dismiss Appeal and related papers to be filed.	RLS	0.50
07/13/09	Work on appeal (0.6); correspondence regarding case (0.4).	SLE	1.00
07/14/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.50
07/14/09	Facilitate service of motion to dismiss appeal (0.3); email correspondence regarding same (0.2).	CIT	0.50
07/14/09	Multiple phone calls and email correspondence regarding filing and service of Motion to Dismiss Appeal in the District Court and related papers.	HJP	0.50
07/15/09	Correspondence regarding case and dismissal.	SLE	0.50
07/17/09	Call miscellaneous court clerk to determine status of order dismissing appeal.	HJP	0.20
07/17/09	Pursue status of entry of order dismissing appeal.	JEH	0.50
07/19/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.60
07/21/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/22/09	Review and analysis of court bankruptcy and appeal dockets; correspondence regarding same.	CLJ	0.70
07/22/09	Correspondence regarding case and open issues.	SLE	0.80
07/23/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/24/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.20

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 8

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
07/27/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.20
07/28/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/29/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.20
07/30/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
07/31/09	Review and analysis of court docket and correspondence regarding relevant pleadings.	CLJ	0.30
<u>Total Hours</u>			<u>332.85</u>

Timekeeper Summary

Andrea L Ducayet	3.10	\$1,131.50
Briana Cioni	34.10	\$10,230.00
Cindy L Jeffery	16.60	\$2,905.00
Cliff I Taylor	46.80	\$16,380.00
David J Parsons	4.40	\$1,606.00
Heather Panko	21.80	\$5,995.00
Jacob L Newton	0.30	\$120.00
Jo E Hartwick	41.60	\$16,432.00
Melanie R Fain	1.00	\$95.00
Peter C D'Apice	31.70	\$16,642.50
Rachael Stringer	19.80	\$4,455.00
Robert T Brousseau	11.50	\$6,325.00
Sander L Esserman	55.00	\$38,500.00
Steven Felsenthal	1.65	\$1,196.25
Terrie D Khoshbin	3.50	\$1,137.50

<u>Total Fees</u>	<u>\$123,150.75</u>
-------------------	---------------------

Itemized Expenses:

Deliveries	198.87
Filing Fees	255.00

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 9

Itemized Expenses:

Local Travel and Parking	6.00
Long distance telephone charges	88.60
Long-Distance Travel Expenses	3,436.28
On-Line Research	676.60
Photocopies	152.00
Transcripts of Hearings	3,774.78
<hr/> Total Expenses	<hr/> \$8,588.13

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 113929

Page 10

Summary of Charges on this Invoice:

Hours	292.85
Fees	\$123,150.75
Expenses	\$8,588.13
Adjustments	\$0.00
<hr/> Total for this Invoice	<hr/> \$131,738.88

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET

SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbsp-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 115058
October 13, 2009

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 09/30/09

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
09/01/09	Review and analysis of court docket for pleadings relevant to the Committee's interest and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/02/09	Review and analysis of court docket for pleadings relevant to the Committee's interest and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/02/09	Correspondence with Committee regarding bar date issues.	SLE	0.70
09/03/09	Review and analysis of court docket for pleadings relevant to the Committee's interest and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/03/09	Review documents regarding asbestos claims report produced by Debtors and Ad Hoc Committee's request for same (1.0), review Debtors' bar date motion (1.5), conduct and review research regarding objection to bar date motion (1.3), prepare objection to bar date motion (1.4).	JEH	5.20
09/03/09	Work on HRA report discovery request.	PCD	1.80
09/03/09	Work on Rule 2004 application (1.4), and review new court ruling on procedures and response to bar date motion (1.1).	PCD	2.50
09/04/09	Review and analysis of court docket for pleadings relevant to the Committee's interest and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/04/09	Review of motion to extend exclusivity period.	CLJ	0.20
09/04/09	Revise calendar of events to include additional hearing dates and deadlines.	CLJ	0.30
09/04/09	Pursue status of preparation of objection to Debtors' motion to set bar date.	JEH	0.20
09/04/09	Work on draft of Rule 2004 request.	PCD	0.30
09/04/09	Research regarding issues for Objection to GM's Motion for Order setting bar date.	RLS	2.10
09/04/09	Correspondence with Committee regarding bar date issues.	SLE	0.50
09/06/09	Review debtor's motion for bar date and various responses.	TDK	1.00
09/07/09	Research regarding issues for Objection to GM's Motion for Order setting bar date.	RLS	2.80
09/07/09	Draft Objection to GM Motion for Order setting bar date.	RLS	4.90

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
09/08/09	Review and analysis of court docket for pleadings relevant to the Committee's interest and correspondence with legal team regarding identified pleadings.	CLJ	0.30
09/08/09	Research regarding bar date objection (0.4), correspondence regarding research findings (0.5).	DJP	0.90
09/08/09	Review and revise Objection of Ad Hoc Committee of Asbestos Claimants to Debtors' Bar Date Motion (2.1), conduct and review additional research for objection to bar date motion (4.3).	JEH	6.40
09/08/09	Work on response to objections and work on draft 2004 request.	PCD	1.80
09/08/09	Continue drafting of discovery requests for HRA reports.	PCD	1.20
09/08/09	Additional research regarding issues for Objection to GM's Motion for Order setting bar date.	RLS	2.80
09/08/09	Complete draft of Objection to GM's Motion for Order setting bar date.	RLS	2.10
09/09/09	Pursue bar date order entered in Quigley case.	ALD	1.30
09/09/09	Review and analysis of court docket for pleadings relevant to the Committee's interests and correspondence with the legal team regarding relevant findings.	CLJ	0.30
09/09/09	Additional research regarding bar date objection (0.9), correspondence regarding research findings (0.4).	DJP	1.30
09/09/09	Extensive review and revisions to Objection to Motion to set bar date.	HJP	2.40
09/09/09	Finalize and file Objection to Bar Date Motion (0.5), and arrange for delivery of Chambers Copy (0.2).	HJP	0.70
09/09/09	Review and revise objection of Ad Hoc Committee of Asbestos Claimants to Debtors' bar date motion (5.9), telephone conference with Ad Hoc Committee regarding objection to bar date motion and other issues in case (1.0), brief review of Motion of Detroit Diesel Corp. to extend stay (0.7).	JEH	7.60
09/09/09	Work on response to bar date motion.	PCD	2.80
09/09/09	Finalize response to motion for bar date.	PCD	1.50
09/09/09	Meet with Mr. D'Apice and Ms. Hartwick regarding revisions to Objection to Bar Date Motion.	RLS	0.30
09/09/09	Assist with finalizing Objection to Bar Date Motion for filing and preparing service list for same.	RLS	2.70
09/09/09	Review objection to bar date motion (0.6) and correspondence with Committee regarding case status (0.2).	SLE	0.80
09/10/09	Review and analysis of court docket for pleadings relevant to the Committee's interests and correspondence with legal team regarding Identified pleadings.	CLJ	0.20
09/10/09	Review materials relating to Detroit Diesel's motion for extension of stay (1.3), conduct legal research regarding motion for extension of stay (1.4).	CIT	2.70
09/10/09	Review Application of Ad Hoc Committee Pursuant to Bankruptcy Rule 2004 to obtain documents from and oral examination of debtors regarding asbestos liabilities, notice of present of same, questions for document (1.8), and correspondence regarding Rule 2004 application (0.5), prepare Certificate of Service of Ad Hoc Committee's objection to Debtors' motion to set bar date (0.3).	JEH	2.60
09/10/09	Edit discovery requests (0.9) and prepare for hearing on bar date issue (1.6).	PCD	2.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 3

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
09/10/09	Analyze Detroit Diesel related issues and motion.	PCD	0.50
09/10/09	Research for Mr. D'Apice regarding preparation for Objection to Bar Date Hearing.	RLS	0.60
09/10/09	Review issues related to bar date motion (0.2), and work on discovery issues (0.4), review removal (0.2), and Detroit Diesel issues (0.2).	SLE	1.00
09/10/09	Several correspondence regarding bar date and assist with obtaining briefing regarding bar date issues.	VJH	1.40
09/11/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/11/09	Review materials relating to Detroit Diesel's motion for extension of automatic stay.	CIT	0.90
09/11/09	Finalize and file Certificate of Service for Objection to Bar Date Motion (0.3), review Debtors' Reply to Ad Hoc Committee's Objection to Bar Date Motion (0.8), review and organize research for argument on Ad Hoc Committee's Objection to Bar Date Motion (2.2).	JEH	3.30
09/11/09	Review briefs and case law and prepare for hearing on bar date issues.	PCD	5.50
09/11/09	Prepare materials for Mr. D'Apice for hearing on Debtors' Bar Date Motion (2.4), and conduct additional research regarding bar date issues (1.8).	RLS	4.20
09/11/09	Correspondence regarding bar date; research Lyondell bar date.	VJH	0.50
09/12/09	Continue review of case law and briefs to prepare for hearing on bar date.	PCD	2.00
09/13/09	Continue preparation for hearing and travel to New York (4.2), review case law and briefs and arguments in other cases to prepare for hearing on bar date motion (6.3).	PCD	10.50
09/14/09	Review legal research regarding extension of automatic stay to non-debtors.	CIT	1.80
09/14/09	Revise documents requests to Debtors (0.8); correspondence regarding document requests (0.3), correspondence regarding bar date and related issues (0.4).	JEH	1.50
09/14/09	Attend hearing on bar date motion (3.2), and draft report on results (1.8).	PCD	5.00
09/14/09	Correspondence regarding bar date motion with legal team.	SLE	0.60
09/14/09	Correspondence with group regarding case; correspondence with Committee regarding hearing on bar date motion.	SLE	0.40
09/15/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/15/09	Correspondence regarding case and document issues.	SLE	0.30
09/16/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/16/09	Review of order establishing bar date.	CLJ	0.30
09/16/09	Work on discovery issues and review orders concerning future claims and present claims concerning impact on discovery issues.	PCD	1.50
09/17/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/17/09	Review of notice of presentment of order establishing procedures for	CLJ	0.10

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 4

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	case management order.		
09/17/09	Review Bar Date Order and Amended Case Management Order (0.4); pursue obtaining copy of complaint in case against Detroit Diesel removed to federal court (0.5).	JEH	0.90
09/18/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/18/09	Review underlying complaint regarding Detroit Diesel's motion to extend Stay (0.4), review Remy International Motion to Extend Stay (0.4).	JEH	0.80
09/21/09	Confer with C. Taylor regarding automatic stay research (0.3), begin legal research in connection with automatic stay and non-debtors (0.7).	BLC	1.00
09/21/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/21/09	Review legal research regarding extension of automatic stay.	CIT	1.90
09/21/09	Search Master Purchase and Sale Agreement and related schedules for assumption or rejection of certain indemnity agreement.	RLS	2.70
09/22/09	Confer with C. Taylor and R. Stringer regarding research in connection with response to Detroit Diesel's motion for extension of automatic stay (0.5), review and analysis of pleadings related to Motion for Extension of Stay (1.8), and begin legal research on various issues related to request for extension of stay (4.4).	BLC	6.70
09/22/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/22/09	Review legal research regarding extension of automatic stay.	CIT	1.40
09/22/09	Westlaw research per Ms. Cioni.	MRF	0.50
09/22/09	Research regarding Objection to Detroit Diesel Motion to Extend Automatic Stay.	RLS	4.60
09/23/09	Legal research in connection with response to motion to extend stay filed by Detroit Diesel (7.9), confer with C. Taylor and R. Stringer regarding same (0.7).	BLC	8.60
09/23/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/23/09	Email correspondence regarding objection to extension of stay.	CIT	0.20
09/23/09	Telephone conference with Mr. Dummer regarding obtaining studies regarding potential liability for asbestos claims (0.3), correspondence with Ms. Skubic regarding Detroit Diesel issues (0.3), telephone conference with Mr. Keller regarding status of Detroit Diesel's motion to extend stay and related matters (0.2).	JEH	0.80
09/23/09	Research regarding Objection to Detroit Diesel Motion to Extend Automatic Stay (3.9), discuss relevant issues with Ms. Cioni (0.7).	RLS	4.60
09/23/09	Calls with attorneys regarding hearing and Detroit Diesel matters.	SLE	1.00
09/24/09	Continue legal research in connection with response in opposition to Detroit Diesel motion to extend stay (6.7), meeting with R. Stringer and C. Taylor discussing research findings (1.4).	BLC	8.10
09/24/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.20

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 5

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
09/24/09	Conference regarding status of objection to Detroit Diesel's motion to extend stay and research in connection with same (0.4), conduct research regarding collateral estoppel and related issues regarding objection to motion to extend stay (1.1).	JEH	1.50
09/24/09	Meet with Mr. Taylor and Ms. Cioni regarding Objection to Detroit Diesel Motion to Extend Automatic Stay.	RLS	1.40
09/24/09	Research regarding Objection to Detroit Diesel Motion to Extend Automatic Stay.	RLS	3.70
09/25/09	Follow-up research in connection with response to Detroit Diesel's motion to extend stay (2.1), confer with C. Taylor regarding research related to motion to extend stay (0.5), confer with J. Hartwick regarding collateral estoppel issues (0.4).	BLC	3.00
09/25/09	Review and analysis of court bankruptcy and adversary dockets and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/25/09	Conduct legal research regarding extension of automatic stay to non-debtors and analyze issues regarding same (2.8), prepare argument for objection to motion to extend stay (2.1).	CIT	4.90
09/25/09	Prepare argument for objection to motion for extension of stay.	CIT	3.10
09/25/09	Conferences regarding objection to Detroit Diesel's motion to extend Stay (0.6), review research regarding collateral estoppel issues (0.9), conduct and review research regarding offensive collateral estoppel and product line exception to no successor liability under California law (1.0), prepare memorandum regarding product line exception (0.8), conduct fact research regarding Detroit Diesel (0.6).	JEH	3.90
09/25/09	Research regarding Objection to Detroit Diesel Motion to Extend Automatic Stay.	RLS	2.10
09/26/09	Draft argument for objection to motion for extension of stay filed by Detroit Diesel (5.2), legal research regarding objection to motion for Extension of stay (4.3).	CIT	9.50
09/27/09	Review and revise objection to extension of automatic stay to non-debtor.	CIT	6.40
09/27/09	Edit response to Detroit Diesel motion.	PCD	2.00
09/28/09	Pursue papers regarding extending stay to non-debtors.	ALD	0.90
09/28/09	Review and comments to latest draft of brief in opposition to Detroit Diesel's motion to extend stay (1.8), legal research in connection with review of brief of opposition to Detroit Diesel's motion to extend stay (0.7).	BLC	2.50
09/28/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.10
09/28/09	Review Ad Hoc Committee's Objection to Detroit Diesel's Motion to Extend Stay (0.8), review responses to similar motions filed in other cases (0.6), correspondence with Mr. Dummer, counsel for Debtors, regarding obtaining studies or forecasts from the Debtors regarding their potential liability for asbestos claims (0.3), telephone call to and correspondence with Ms. Wine regarding studies or forecasts of Debtors asbestos liabilities (0.4).	JEH	2.10
09/28/09	Review motion to file omnibus objection and the impact on clients.	PCD	0.40
09/28/09	Continued work on response to Detroit Diesel motion.	PCD	1.80
09/29/09	Review and comments to latest draft of brief in opposition to Detroit Diesel's motion to extend stay (2.3), legal research in connection with	BLC	4.20

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 6

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	reviews of objection to Detroit Diesel's motion for extension of stay (1.9).		
09/29/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
09/29/09	Review and revise Objection to extension of stay.	CIT	4.00
09/29/09	Review and revise objection to Detroit Diesel's motion to extend stay (1.7), conferences regarding objection to motion to extend stay (0.5).	JEH	2.20
09/29/09	Edit response to Detroit Diesel motion (1.5) and review cases on the issue of extending the stay to non-debtor parties (3.3).	PCD	4.80
09/29/09	Assist with preliminary cite check of Objection to Detroit Diesel Motion to Extend Stay.	RLS	0.80
09/29/09	Review motion and prepare for hearing.	SLE	0.50
09/30/09	Review and analysis of court docket for pleadings relevant to the Committee and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
09/30/09	Review and revise Objection to Motion for Stay filed by Detroit Diesel.	CIT	3.20
09/30/09	Correspondence with Mr. Keller regarding case removed by Detroit Diesel (0.2), correspondence with Ms. Wine regarding request for reports and projections regarding asbestos liabilities from Debtors (0.2), conference regarding formatting and style requirements for objection to Detroit Diesel's motion to extend stay (0.3).	JEH	0.70
09/30/09	Begin drafting Table of Contents and Table of Authorities for Objection to Detroit Diesel Motion to Extend Stay (1.2), perform cite check and subsequent history check (2.1).	RLS	3.30
09/30/09	Review notice of bar date. Confer with Peter D'Apice regarding same. Correspondence with Sander Esserman regarding same. Calendar for monitoring with ad hoc committee.	SAF	0.25
Total Hours			230.65

Timekeeper Summary

Andrea L Ducayet	2.20	\$803.00
Briana Cioni	34.10	\$10,230.00
Cindy L Jeffery	5.80	\$1,015.00
Cliff I Taylor	40.00	\$14,000.00
David J Parsons	2.20	\$803.00
Heather Panko	3.10	\$852.50
Jo E Hartwick	39.70	\$15,681.50
Melanie R Fain	0.50	\$47.50
Peter C D'Apice	48.40	\$25,410.00
Rachael Stringer	45.70	\$10,282.50
Sander L Esserman	5.80	\$4,060.00

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 7

Steven Felsenthal	0.25	\$181.25
Terrie D Khoshbin	1.00	\$325.00
Van J Hooker	1.90	\$807.50
<hr/> Total Fees		<hr/> \$84,498.75

Itemized Expenses:

Court Call	58.00
Long distance telephone charges	10.10
Long-Distance Travel Expenses	1,326.17
Photocopies	9.20
<hr/> Total Expenses	<hr/> \$1,403.47

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 115058

Page 8

Summary of Charges on this Invoice:

Hours	230.65
Fees	\$84,498.75
Expenses	\$1,403.47
Adjustments	\$0.00
<hr/> Total for this Invoice	<hr/> \$85,902.22

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET
SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbsp-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 116115
November 13, 2009

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 10/31/09

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
09/14/09	Review and analysis of court docket for pleadings relevant to the committee's interest and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
10/01/09	Review and analysis of court docket for pleadings relevant to the committee's interest and correspondence with legal team regarding relevant pleadings.	CLJ	0.50
10/01/09	Review of motion to dismiss and opposition to Detroit Diesel motion to extend stay of Picheron; review of joinder in objection of individual plaintiffs.	CLJ	0.30
10/01/09	Review and revise objection to Detroit Diesels motion for extension to automatic stay (2.8); facilitate filing and service of objection (0.3).	CIT	3.10
10/01/09	Review and revise objection to Remy Int'l motion for extension of automatic stay (1.1); facilitate filing and service of objection (0.4).	CIT	1.50
10/01/09	Prepare material for October 6th hearing on motions for extension of stay.	CIT	1.80
10/01/09	Assist with filing and service of two objections to motions to extend automatic stay (Detroit Diesel and Remy International) (1.7); pursue delivery of chambers copies of both pleadings to Judge Gerber (0.4).	HJP	2.10
10/01/09	Prepare email service list to key parties (0.2); arrange for preparation of master email service list (0.3); electronically file objection to Remy International's motion to extend stay (0.3); arrange for service and chambers delivery of same (0.2); review docket regarding other objections to motions to extend stay (0.3); telephone call to and correspondence with Ms. Wine, counsel for debtors, regarding obtaining studies and/or forecasts of debtors' potential liability for asbestos claims (0.3).	JEH	1.60
10/01/09	Edit response to Detroit Diesel motion and review other filings in order to prepare for response to motion.	PCD	1.50
10/01/09	Finalize brief and response to Detroit Diesel motion.	PCD	1.30
10/01/09	Prepare response to Remy International motion to extend stay.	PCD	0.50
10/01/09	Continue drafting Table of Contents and Table of Authorities for Objection to Detroit Diesel Motion to Extend Stay (0.9); perform cite check and subsequent history check (2.8); make edits and prepare objection for filing (0.5).	RLS	4.20
10/01/09	Review final draft of Detroit Diesel objection.	RTB	1.00
10/01/09	Review and revise motion regarding Detroit Diesel (0.6);	SLE	1.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	correspondence regarding case with Committee (0.3); work on response to Remy motion to extend stay (0.6).		
10/02/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/02/09	Review of Remy International's motion to strike Ad Hoc Committee of Personal Injury Asbestos Claimants' objection to motion to extend stay; review of memorandum in support and notice.	CLJ	0.50
10/02/09	Draft Response to Remy's motion to strike objection to extension of stay request (2.1); conduct legal research regarding motion to strike objection (2.4); email correspondence regarding response to motion to strike (0.3).	CIT	4.80
10/02/09	Continue drafting response to Remy's motion to strike.	CIT	4.30
10/02/09	Conduct research regarding response to Remy International's Motion to Strike the Ad Hoc Committee's Objection.	HJP	4.50
10/02/09	Review and revise Response to Remy International's Motion to Strike the Ad Hoc Committee's Objection.	HJP	1.50
10/02/09	Telephone conference with Ms. Wine regarding studies and reports regarding Debtors' potential liability for asbestos claims (0.3); review Remy International's motion to strike Ad Hoc Committee of Asbestos Personal Injury Claimants' Objection to Remy's motion to extend and enforce stay (0.4); conferences and correspondence regarding responding to motion to strike (0.4); review Joinder to Objection of Ad Hoc Committee of Asbestos Personal Injury Claimants to the Motion of Remy International (0.1).	JEH	1.20
10/02/09	Work on reply papers to Remy Motion to Strike; telephone conference with Robert Phillips.	PCD	0.50
10/02/09	Continue editing of reply brief to Remy International Motion to Strike.	PCD	0.70
10/02/09	Review Remy International motion to strike our response and analyze reply options.	PCD	0.80
10/02/09	Prepare materials for Mr. Esserman for hearing on Detroit Diesel Motion to Extend Stay.	RLS	2.10
10/02/09	Work on hearing issues regarding Remy and Detroit Diesel (0.2); correspondence with Committee regarding case (0.2); review of filed pleadings regarding case (0.2); review and revise responsive papers regarding motion to strike (0.4).	SLE	1.00
10/03/09	Email correspondence regarding response to Remy's motion to strike.	CIT	0.20
10/05/09	Review of reply of Remy in support of motion to extend stay.	CLJ	0.20
10/05/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/05/09	Review of Joinder of Simmons Claimants in objection of Ad Hoc Committee of Asbestos Personal Injury Claimants to Remy motion to extend stay.	CLJ	0.10
10/05/09	Draft Response to Motion to Strike (5.5); facilitate filing and service of Response to motion to strike (0.3).	CIT	5.80
10/05/09	Prepare material for October 6th hearing.	CIT	1.10

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 3

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
10/05/09	Assist with revisions to response to motion to strike (0.4); assist with service of same and pursue delivery of chambers copy of same (0.2).	HJP	0.60
10/05/09	Review and revise draft response to Remy's motion to strike, confer with Mr. Taylor regarding draft response.	JLN	0.50
10/05/09	File Response of Ad Hoc Committee of Asbestos Personal Injury Claimants to Remy International's Motion to Strike Objection (0.4); prepare Certificates of Service for Objections to Detroit Diesel 's and Remy International's motions to extend stay and response to Remy International's Motion to Strike Objection (0.4); electronically file Certificates of Service (0.3); review and organize papers filed regarding Debtors application to retain and employ Evercore Group as Investment Banker and Financial Advisor for chambers conference (2.6).	JEH	3.70
10/05/09	Review final version of response to Remy International Motion to Dismiss, and review debtors amended schedule for asbestos claims.	PCD	0.50
10/05/09	Review reply filed by Remy International (0.4) and review docket for any other filings that may apply to hearing (0.3); review Evercore response to objection to Evercore retention (0.5).	PCD	1.20
10/05/09	Prepare for hearing on Detroit Diesel motion to extend stay (3.1); Prepare for hearing on Evercore retention (1.4).	SLE	4.50
10/05/09	Correspondence with Committee regarding case and open issues.	SLE	0.40
10/06/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/06/09	Analyze issues regarding extension of automatic stay (0.4); email correspondence regarding automatic stay issues (0.3); prepare for hearing regarding automatic stay (0.4).	CIT	1.10
10/06/09	Draft proposed order denying Detroit Diesel and Remy relief sought in their motions for extension of automatic stay (0.6); email correspondence regarding proposed orders (0.2); review and revise proposed orders (0.4).	CIT	1.20
10/06/09	Review and revise Ad Hoc Committee of Asbestos Personal Injury Claimants' Application Pursuant to Rule 2004 Authorizing and Directing the Production of Documents by and the Oral Examination of the Debtors (0.3); correspondence regarding court's denial of Detroit Diesel's and Remy International's motion to extend stay and Remy International's motion to strike Ad Hoc Committee's objection to motion to extend stay (0.2); review and revise proposed order regarding denial of stay motions (0.4).	JEH	0.90
10/06/09	Work on argument on motion to extend stay.	PCD	0.50
10/06/09	Prepare for hearings on Evercore, Detroit Diesel and Remy (1.0); attend hearing regarding Evercore, Detroit Diesel and Remy matters (2.5); conference and correspondence with Committee regarding case (0.3).	SLE	3.80
10/06/09	Review and revise order; correspondence regarding proposed order.	SLE	0.30
10/07/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/07/09	Review and revise proposed order denying relief requested by Remy and Detroit Diesel (0.4); email correspondence regarding revised orders on Remy and Detroit Diesel motions (0.3).	CIT	0.70
10/07/09	Finalize Application of the Ad Hoc Committee of Personal Injury	JEH	3.60

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 4

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	Claimants Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Belief to Have Knowledge of Relevant Matter, Proposed Order with Document Request attached and Notice of Presentment of Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Compelling the Production of Documents by, and a Deposition of, the Debtor (3.2); electronically file and serve 2004 Application (0.4).		
10/07/09	Assist in preparing Notice of Rule 2004 Examinations for filing and service.	RLS	0.80
10/08/09	Confer with Mr. D'Apice regarding hearing (0.2); download audio version of October 6 hearing (0.4).	CLJ	0.60
10/08/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/08/09	Telephone conferences with Ms. Dennis regarding transcript of October 6, 2009; correspondence regarding transcripts.	CLJ	0.20
10/08/09	Review and revise proposed order (0.7); email correspondence regarding proposed order on Remy and Detroit Diesel matters (0.2).	CIT	0.90
10/08/09	Pursue delivery of chambers copy of Application of Rule 2004 Examination, phone calls and email correspondence regarding delivery of chambers copies.	HJP	0.40
10/08/09	Arrange for copies of Rule 2004 Application, Order and Notice of Presentment to be delivered to chambers; review revised order denying Detroit Diesel and Remy International's motions to extend stay and Remy International's motion to strike Ad Hoc Committee's objection to Remy International's motion to extend stay.	JEH	0.50
10/09/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/09/09	Confer with Ms. Hartwick and Mr. Taylor regarding delivery of order regarding motions for relief from automatic stay to Judge Gerber's chambers; phone call and correspondence with David Benhamou regarding delivery of same.	HJP	0.40
10/09/09	Telephone conference with Ms. Blum, Judge Gerber's courtroom deputy regarding submitting order denying Detroit Diesel and Remy International's motions to extend stay and Remy International's motion to strike Ad Hoc Committee's objection to Remy International's motion to extend stay (0.5); prepare transmittal letter to Ms. Blum submitting order (0.6); prepare and file Certificates of Service for Application of the Ad Hoc Committee of Personal Injury Claimants Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Belief to Have Knowledge of Relevant Matter, Proposed Order with Document Request attached and Notice of Presentment of Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Compelling the Production of Documents by, and a Deposition of, the Debtor (0.9); correspondence regarding obtaining reports by Hamilton Rabinovitz & Associates estimating pending and future asbestos personal injury liabilities (0.2); review Rule 2004 application and document requests directed to Debtors to obtain HRA reports (0.6); review Debtors' Motion to Make Orders Apply to Subsequent Debtors (0.5); confer With Mr. Esserman regarding	JEH	3.40

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 5

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
10/09/09	Rule 2004 Application directed to Hamilton Rabinovitz & Associates (0.3). Work on discovery regarding GM and asbestos discovery propounded to GM (0.4); correspondence regarding asbestos discovery propounded to GM (0.3).	SLE	0.70
10/12/09	Review Notice of Adjournment of Debtors' motion to retain Evercore Group as Investment Banker and Financial Advisor and order setting out agreement of Official Committee of Unsecured Creditors and United States Trustee regarding same.	JEH	0.60
10/12/09	Review newly filed Evercore pleadings.	PCD	0.80
10/13/09	Review and analysis of court bankruptcy and adversary dockets and Correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/13/09	Work on client inquiry and respond to same.	JLN	0.50
10/13/09	Review Order denying the Detroit Diesel and Remy motions to extend the stay and correspondence regarding order.	JEH	0.20
10/13/09	Review order denying Detroit Diesel and Remy motions and forward to committee.	PCD	0.20
10/14/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/14/09	Review of order denying Detroit Diesel motion to extend stay, Remy International's motion to strike Ad Hoc Committee objection, and Remy International's motion to extend stay.	CLJ	0.20
10/14/09	Review new filings for any impact on client's interests.	PCD	0.10
10/15/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/15/09	Telephone call regarding October 6 transcript to Ms. Dennis; correspondence with Mr. Esserman and Mr. D'Apice regarding October 6 transcript.	CLJ	0.50
10/15/09	Review filings and hearing agenda for any impact on client.	PCD	0.10
10/16/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/19/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/20/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/21/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/21/09	Correspondence and telephone conference with Ms. Wine regarding Debtors' production of documents requested by the Ad Hoc Committee of Asbestos Personal Injury Claimants (0.4); correspondence regarding production of documents and regarding continuing hearing on Rule 2004 Application (0.2).	JEH	0.60
10/22/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/22/09	Correspondence regarding documents to be produced by the Debtors and regarding confidentiality agreement in connection with same.	JEH	0.70
10/23/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/26/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 6

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
10/26/09	Review of agenda of matters scheduled for hearing October 28.	CLJ	0.10
10/26/09	Correspondence with Ms. Wine regarding Debtors' production of documents and regarding confidentiality agreements regarding same.	JEH	0.30
10/26/09	Review government proposal concerning Daimler litigation.	PCD	0.10
10/27/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
10/27/09	Review of amended agenda of matters scheduled for hearing on October 28.	CLJ	0.10
10/27/09	Correspondence and telephone conference with Ms. Fine regarding Debtors' production of documents sought by Rule 2004 Application and regarding confidentiality agreements regarding same.	JEH	0.60
10/28/09	Correspondence regarding Debtors' agreement to produce reports subject to confidentiality agreement and regarding rescheduling hearing on Rule 2004 Application.	JEH	0.60
10/29/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
10/29/09	Correspondence regarding new hearing date on Rule 2004 Application and regarding confidentiality agreement.	JEH	0.20
10/30/09	Work on issues regarding stipulation (0.6); correspondence with Committee regarding case (0.4).	SLE	1.00
Total Hours			94.20

Timekeeper Summary

Cindy L Jeffery	8.40	\$1,470.00
Cliff I Taylor	26.50	\$9,275.00
Heather Panko	9.50	\$2,612.50
Jacob L Newton	1.00	\$400.00
Jo E Hartwick	18.70	\$7,386.50
Peter C D'Apice	8.80	\$4,620.00
Rachael Stringer	7.10	\$1,597.50
Robert T Brousseau	1.00	\$550.00
Sander L Esserman	13.20	\$9,240.00
Total Fees		\$37,151.50

Itemized Expenses:

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 7

Itemized Expenses:

Long distance telephone charges	33.68
Long-Distance Travel Expenses	1,489.44
On-Line Research	1,809.45
Photocopies	35.60
<hr/> Total Expenses	<hr/> \$3,368.17

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116115

Page 8

Summary of Charges on this Invoice:

Hours	94.20
Fees	\$37,151.50
Expenses	\$3,368.17
Adjustments	\$0.00
<hr/>	<hr/>
Total for this Invoice	\$40,519.67

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET

SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbsp-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 116461
December 21, 2009

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 11/30/09

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
11/02/09	Review and analysis of court docket and correspondence with legal team regarding same.	CLJ	0.20
11/02/09	Work on response to motion to amend sale order.	PCD	2.00
11/02/09	Work on objection to motion to amend sale order (0.6), conference regarding objection to motion to amend sale order (0.4).	SLE	1.00
11/04/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/04/09	Review of notice of hearing change and agenda of matters scheduled for hearing November 5.	CLJ	0.10
11/04/09	Correspondence regarding case (0.3), review issues related to court appearances regarding case and stipulation (.07).	SLE	1.00
11/10/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/11/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/11/09	Correspondence with Ms. Wine regarding form of confidentiality to be provided by Debtors.	JEH	0.20
11/12/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/12/09	Correspondence from Ms. Wine regarding Debtors' proposed confidentiality agreement; brief review of proposed agreement.	JEH	0.50
11/13/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/16/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/16/09	Detailed review of proposed Confidentiality Agreement regarding production of documents by Debtors (0.6), review committee membership (0.3), correspondence regarding revisions to Confidentiality Agreement (0.2), review revised Confidentiality Agreement (0.3).	JEH	1.40
11/16/09	Work on confidentiality agreement and objection.	PCD	1.50
11/17/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
11/17/09	Review draft confidentiality agreement regarding production HRA	PCD	0.30

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116461

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
	reports.		
11/18/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
11/18/09	Review of amended agenda regarding hearing.	CLJ	0.10
11/19/09	Correspondence and telephone conference with Ms. Wine regarding confidentiality agreement and production of documents.	JEH	0.30
11/23/09	Review of agenda of matters scheduled for hearing November 24.	CLJ	0.10
11/23/09	Correspondence with Ms. Wine regarding confidentiality agreement (0.3), correspondence circulating confidentiality agreement (0.3).	JEH	0.60
11/24/09	Correspondence with Ms. Wine regarding confidentiality agreement between Debtors and Ad Hoc Committee of Asbestos Claimants regarding production of documents.	JEH	0.40
11/25/09	Correspondence with Ms. Wine regarding confidentiality agreement between Debtors and Ad Hoc Committee of Asbestos Claimants and regarding adjournment of hearing on Rule 2004 Application until January.	JEH	0.60
11/30/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
11/30/09	Review SDNY local rules regarding filing procedures per Ms. Hartwick's request.	HJP	0.20
Total Hours			12.50

Timekeeper Summary

Cindy L Jeffery	2.50	\$437.50
Heather Panko	0.20	\$55.00
Jo E Hartwick	4.00	\$1,580.00
Peter C D'Apice	3.80	\$1,995.00
Sander L Esserman	2.00	\$1,400.00
Total Fees		\$5,467.50

Itemized Expenses:

Long distance telephone charges	2.02
Long-Distance Travel Expenses	4.50
Total Expenses	\$6.52

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116461

Page 3

Summary of Charges on this Invoice:

Hours	12.50
Fees	\$5,467.50
Expenses	\$6.52
Adjustments	\$0.00
<hr/> Total for this Invoice	<hr/> \$5,474.02

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET
SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbsp-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 116716
January 15, 2010

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 12/31/09

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
12/01/09	Correspondence with Ms. Benfield regarding adjournment of hearing on Ad Hoc Committee's Rule 2004 Application.	JEH	0.20
12/10/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.10
12/11/09	Correspondence with Ms. Wine regarding confidentiality agreement (0.2), brief review of HRA Reports produced pursuant to confidentiality agreement (0.7).	JEH	0.90
12/15/09	Review and analysis of court docket; review of notice of hearing of matters scheduled for December 16; correspondence with legal team regarding relevant pleadings.	CLJ	0.40
12/16/09	Review notice of adjournment of hearing on Ad Hoc Committee of Asbestos Claimants' Rule 2004 Application (0.2); detailed review of reports that were prepared in December 2007 and June 2008 regarding General Motors' estimated potential liability for pending and future asbestos personal injury claims (1.5); correspondence with Ad Hoc Committee regarding those reports and regarding executing confidentiality agreement to obtain access to same (0.4); forward signature pages of Messrs. Brayton and Cooney to counsel for Debtors (0.2); telephone conference with Ms. Wine regarding status of Debtors' search for other responsive documents (0.2).	JEH	2.50
12/17/09	Correspondence regarding and review of signature pages from The Lanier Law Firm and Waters & Kraus; prepare correspondence to Ms. Wine forwarding same and requesting status reports on Debtors' search for additional documents responsive to the requests of the Ad Hoc Committee of Asbestos Personal Injury Claimants.	JEH	0.50
12/18/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
12/21/09	Correspondence with Ms. Wine regarding distributing reports on General Motors' estimated pending and future potential asbestos personal injury liabilities (0.2); prepare correspondence circulating reports to members of the Ad Hoc Committee who have executed confidentiality agreements (0.4).	JEH	0.60
12/22/09	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
12/23/09	Correspondence and telephone conference with Ms. Wine, counsel for Debtors, regarding discovery issues.	JEH	0.40

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116716

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
12/28/09	Review and analysis of court docket and correspondence with legal team Regarding relevant pleadings.	CLJ	0.20
12/28/09	Conference regarding status of pursuit of Rule 2004 motion.	JEH	0.20
	<u>Total Hours</u>		<u>6.50</u>

Timekeeper Summary

Cindy L Jeffery	1.20	\$210.00
Jo E Hartwick	5.30	\$2,093.50
<u>Total Fees</u>		<u>\$2,303.50</u>

Itemized Expenses:

Long distance telephone charges	1.62
<u>Total Expenses</u>	<u>\$1.62</u>

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 116716

Page 3

Summary of Charges on this Invoice:

Hours	6.50
Fees	\$2,303.50
Expenses	\$1.62
Adjustments	\$0.00
<hr/>	<hr/>
Total for this Invoice	\$2,305.12

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS

2323 BRYAN STREET

SUITE 2200

DALLAS, TEXAS 75201-2689

TELEPHONE: (214) 969-4900

FACSIMILE: (214) 969-4999

WEB SITE: www.sbsp-law.com

GENERAL MOTORS AD HOC ASBESTOS
COMMITTEE

Invoice 117391
February 22, 2010

Client/Matter No.: GE019-0002

Re: GENERAL MOTORS CORPORATION - BANKRUPTCY

SLE

For services performed through 01/31/10

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
01/04/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/05/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/07/10	Review and analysis of court docket; review of motion to extend exclusivity period; correspondence with legal team regarding relevant pleadings.	CLJ	0.30
01/07/10	Conference regarding hearing on Application of Ad Hoc Committee of Asbestos Personal Injury Claimants Pursuant to Rule 2004; telephone conference with Ms. Wine regarding adjournment of hearing.	JEH	0.30
01/08/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/11/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.30
01/11/10	Correspondence with Ms. Wine regarding adjourning hearing on Rule 2004 Application filed by Ad Hoc Committee of Asbestos Personal Injury Claimants.	JEH	0.30
01/12/10	Review Notice of Adjournment of hearing on the Application of the Ad Hoc Committee of Asbestos Personal Injury Claimants Pursuant to Rule 2004 (0.2); correspondence regarding adjournment of hearing (0.4).	JEH	0.60
01/13/10	Review and analysis of court docket; review of agenda of matters scheduled for hearing January 14; correspondence with legal team regarding relevant pleadings.	CLJ	0.30
01/14/10	Prepare Notice of Withdrawal of Rule 2004 Application.	JEH	0.50
01/15/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/15/10	Electronically file and serve Notice of Withdrawal of Rule 2004 Application (0.8); prepare certificate of service for Notice of Withdrawal of Rule 2004 Application (0.3).	JEH	1.10
01/18/10	Review and analysis of court docket; review of agenda of matters scheduled for hearing January 20; correspondence with legal team regarding relevant pleadings and agenda.	CLJ	0.30
01/20/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/20/10	Finalize and electronically file Certificate of Service of Notice of Withdrawal of Rule 2004 Application.	JEH	0.50

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 117391

Page 2

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Hours</u>
01/21/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/25/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/27/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
01/29/10	Review and analysis of court docket and correspondence with legal team regarding relevant pleadings.	CLJ	0.20
	<u>Total Hours</u>		<u>6.30</u>

Timekeeper Summary

Cindy L Jeffery	3.00	\$525.00
Jo E Hartwick	3.30	\$1,303.50
<u>Total Fees</u>		<u>\$1,828.50</u>

Itemized Expenses:

Long distance telephone charges	2.42
On-Line Research	356.82
<u>Total Expenses</u>	<u>\$359.24</u>

Stutzman, Bromberg, Esserman & Plifka Invoice
Invoice 117391

Page 3

Summary of Charges on this Invoice:

Hours	6.30
Fees	\$1,828.50
Expenses	\$359.24
Adjustments	\$0.00
<hr/>	<hr/>
Total for this Invoice	\$2,187.74